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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
the Commission's Forfeiture)
Policy Statement and Amendment)
of Section 1.80 of the Rules)
To Incorporate the Forfeiture)
Guidelines)

CI Docket No. 95-6

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MAR 27 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

COMMENTS OF THE
NATIONAL ASSOCIATION OF BROADCASTERS

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TABLE OF CONTENTS

	<u>Page</u>
EXECUTIVE SUMMARY	i
I. BACKGROUND	1
II. THE FCC SHOULD CHANGE ITS BASIC ENFORCEMENT APPROACH AS WELL AS ITS BASE FINE LIST	5
III. REVISIONS TO THE BASE FINE LIST	6
IV. ADOPTING A MORE EFFECTIVE METHOD OF ACHIEVING RULE COMPLIANCE	9
V. SPECIFIC RULE CONSIDERATIONS	11
VI. CONCLUSION	16

EXECUTIVE SUMMARY

In these comments the National Association of Broadcasters responds to the Commission's Notice of Proposed Rule Making -- a Notice issued in response to a judicial decision invalidating the agency's 1991 and 1993 "base fine" Policy Statements on the levying of fines and forfeitures for various rule violations. NAB had challenged these 1991 and 1993 Policy Statements at the Commission and had intervened in a successful court challenge. The decision of the United States Court of Appeals for the District of Columbia Circuit agreed with the challengers' view that each Policy Statement was adopted unlawfully, in that they had the effect of a "rule" but had not been adopted through a notice-and-comment rule making.

Now as the Commission begins anew to develop its regulatory approach to rule compliance, NAB believes that the agency -- in addition to developing a new and more reasonable "base fine" system -- should take a fresh look at the best way to achieve overall rule compliance. In this fashion, the Commission would better achieve its legitimate goal of rule compliance without inflicting unreasonable penalties on broadcast stations, other communications licensees and those additional parties now subject to FCC enforcement jurisdiction.

Concerning the level of base fines, NAB urges a general 50% reduction in the base fine levels for all fines that do not involve threats to safety, blatant evasion of the FCC's regulatory process (e.g. operation without an FCC permit or license) or the potential of serious interference to broadcasters

or to other communications operations. We also offer some specific commentary on Commission enforcement/assessment of fines on certain rules that are undergoing revision.

But, the fundamental change in the FCC's approach to achieving rule compliance relates to the methods employed by the Commission's Washington and field personnel involved in rule enforcement. That is, NAB recommends that the agency simply cease its issuance of fines for "first occurrences" of lesser offenses (those that do not involve threats to safety, evasion of the FCC's regulatory process or serious interference). For the detection of these often trivial violations (e.g. failure to have placed one or two documents into the station's public file in a timely fashion), the Commission and its staff simply should issue a warning and an explanation on how the station can achieve compliance. However, a failure of the licensee to come into compliance in a reasonable period of time should be met by the base fine for the next violation detected and an increase over the base fine level for a repeated violation.

By taking these steps the Commission will introduce greater equity into its enforcement process and also make that process more effective.

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**COMMENTS OF THE
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I. BACKGROUND

On August 1, 1991, the Commission' released a Policy Statement ("1991 Policy Statement")¹ which altered the Commission's previous approach to assessing forfeitures -- the levying of fines on a "case-by-case" basis. The 1991 Policy Statement created a schedule of standard "base fines" for specific FCC rule violations. Here the Commission described the base forfeiture schedule as merely a "policy statement" not subject to the notice-and-comment requirements of the Administrative Procedure Act ("APA").²

¹Policy Statement, Standards for Assessing Forfeitures, 6 FCC Rcd 4695 (1991).

²5 U.S.C. § 553 (b) (A): "... except when notice or hearing is required by statute, this subsection does not apply ... (A) to interpretive rules [or] general statements of policy"

Many interested parties -- including the National Association of Broadcasters ("NAB")³ -- filed petitions for reconsideration or other responsive filings with the Commission. The majority of these parties argued that the schedule operated, essentially, as a "rule," which meant that the Commission effectively had amended Section 1.80 of the Commission's Rules and, therefore, should have done so subject to the rulemaking requirements of the APA.⁴ But, despite the quantity and rightfulness of these arguments, the Commission refused to reconsider the forfeiture schedule, again maintaining that the Commission retained discretion to disregard the schedule in "situations that arise," and, therefore, that it was not a "rule."⁵

Aside from pointing out the need for the agency to comply with the APA, NAB and other parties argued that the 1991 Policy Statement suffered from several other defects and problems. Among other things, we argued that the base fines often did not correlate to the seriousness of the particular violation -- that the "punishment" often well exceeded the "gravity of the crime." Moreover, the Commission was presented with evidence that the FCC's enforcement policy acted like a

³NAB is a nonprofit, incorporated association of radio and television stations and networks which serves and represents the American broadcast industry.

⁴See NAB Comments on Petitions for Reconsideration, filed October 7, 1991.

⁵Memorandum Opinion and Order, 7 FCC Rcd 5339 (1992).

"binding rule" insofar as the majority of enforcement actions taken following the 1991 Policy Statement were based -- rigidly - on the terms of the forfeiture schedule.⁶

In 1993 the Commission issued another Policy Statement ("1993 Policy Statement"),⁷ which amended the terms of the 1991 Policy Statement by reducing, modestly, the base forfeitures of some violations which did not involve health or safety concerns. While these changes headed the FCC in the right direction, forfeitures imposed after the 1993 Policy Statement continued to underscore how the Commission was using the forfeiture list as a binding rule.

Beyond parties' protesting the nature of the two Policy Statements, including the levels of the various base fines, a judicial challenge also was lodged. On July 12, 1994, the United States Court of Appeals for the District of Columbia Circuit set aside the two Policy Statements.⁸ There the Court agreed with the fundamental argument of many who earlier had protested the

⁶The fact that forfeitures levied after the 1991 Policy Statement were nearly all much higher than those levied in earlier years was one of the bases of the judicial challenge to the Policy Statements (see infra). That is, even though there were some "adjustments" to the levels of the fines actually imposed, the range of fines assessed broadcasters and others almost uniformly were at a significantly higher level than seen before the 1991 Policy Statement. As such, the minor adjustments to final fine amounts barely affected the macro change in the elevated fine levels.

⁷Policy Statement, Standard for Assessing Forfeitures, 8 FCC Rcd 6215 (1993).

⁸United States Telephone Association v. FCC ("USTA v. FCC"), 28 F.3d 1232 (D.C. Cir. 1994).

Commission's base fines lists and revised forfeiture approach: that the base forfeiture schedule "...was not a policy statement and, therefore, should have been put out for comment under the [APA]."⁹ Now eight months after the USTA v. FCC decision, the Commission has initiated a rulemaking proceeding designed to establish a revised approach to attaining compliance with the FCC's substantive rules.¹⁰

Today NAB offers its views on the Commission's Notice in the above-captioned proceeding. In this Notice the Commission asks for comment on the same forfeiture schedule (contained in the 1993 Policy Statement) employed by the Commission prior to the USTA v. FCC court ruling.

While that schedule may be a good starting point for part of the relevant analysis here, it is not an appropriate ending point. Rather, the outcome of this proceeding should be a set of base fines which are -- in several respects -- much lower than found in the 1993 Policy Statement. But, even more important than lowering most of the base fines, we believe it is important for the Commission to take an entirely new approach to the enforcement of its rules.

⁹Id.

¹⁰See Notice of Proposed Rule Making ("Notice") in CI Docket No. 95-6, FCC 95-24, released February 10, 1995.

II. THE FCC SHOULD CHANGE ITS BASIC ENFORCEMENT APPROACH, AS WELL AS ITS BASE FINE LIST.

Now as the Commission begins anew to develop its regulatory approach to rule compliance, NAB believes that the agency -- in addition to developing a new and more reasonable "base fine" list -- should take a fresh look at the best way to achieve overall rule compliance. In this fashion, we believe the Commission would better achieve its legitimate goal of rule compliance without inflicting unreasonable penalties on broadcast stations, on other communications licensees and on those additional parties now subject to FCC enforcement jurisdiction.

Concerning the level of base fines, NAB urges a general 50% reduction in the base fine levels for all fines that do not involve threats to safety, blatant evasion of the FCC's regulatory process (e.g. operation without an FCC permit or license) or the potential of serious interference to broadcasters or other communications operations. We also offer some specific recommendations vis-a-vis the enforcement/assessment of fines for certain rules currently undergoing regulatory change.

But, the requested, fundamental change in the FCC's approach to achieving rule compliance relates to the methods employed by the Commission's Washington-based and field personnel involved in rule enforcement. That is, NAB recommends that the agency simply cease its issuance of fines for "first occurrences" of lesser offenses (those that do not involve threats to safety, evasion of the FCC's regulatory process or serious interference). For the detection of these often trivial violations, the

Commission and its staff simply should issue a warning and an explanation on how the station can achieve compliance.¹¹

However, a failure of the "warned" licensee to come into compliance within a reasonable period of time should be met by the base fine for the next violation detected and an increase over the base fine level for a repeated violation.

III. REVISIONS TO THE BASE FINE LIST

As a central principle advanced in NAB's comments today, we believe that base forfeitures should be reduced further for violations that do not affect safety, do not involve evasion of the Commission's regulatory process and do not involve the creation of serious interference to other broadcasters or to other communications operations. For these violations we believe the Commission should reduce the base forfeiture levels specified in the Notice by a factor of 50%. In this fashion, such "less serious" violations will not be met with the severe penalties that had characterized the employment of the two Policy Statements.

Similarly, we believe the Commission's base forfeiture lists, as well as its staff involved in rule enforcement (see below) should recognize the difference between rules that involve the occurrence, or absence of a single act (such as operation

¹¹As noted below, however, if the Commission's staff were presented with, for example, a station which had violated several rules -- even if each might be considered of lesser gravity -- then the issuance of a "Notice of Apparent Liability" would be appropriate.

without an FCC authorization) as opposed to a rule that covers a multitude of elements (such as compliance with the Commission's public file rule).¹² Violation of only a small portion of one rule (e.g. missing one or two documents that should be in the public file) should result in only a partial assessment of the base fine.

On the other hand, NAB believes that the more serious rule violations should be enforced vigorously. For example, NAB does not urge a reduced sanction for violations such as failure to properly light or mark a tower,¹³ operation without an FCC permit or license, false distress communication or malicious interference.

Moreover, and to ensure that the Commission will not inflict a crippling blow on stations that are smaller, less profitable operations, we urge the Commission to make proper use of the downward adjustment factors found in its two earlier enforcement Policy Statements and advanced again in its Notice.

¹²See Sections 73.3526 (commercial stations) and 73.3527 (noncommercial stations).

¹³Indeed, we believe that non-licensee tower owners should be subject to a base fine higher than that specified in the Notice. In comments NAB filed on March 21, 1995, in response to the Commission's "tower registration" Notice of Proposed Rule Making in WT Docket No. 95-5, NAB urged the Commission to consider the imposition of higher violations for tower lighting and marking and other related rules committed by tower owners who are not FCC permittee or licensees. NAB reasoned there -- and reemphasizes here -- that such tower owners have a lesser incentive to comply with tower rules, etc. because of their limited interface with the FCC (as opposed to licensees/permittees who have much more at stake under FCC jurisdiction).

Otherwise, the agency will find that its enforcement actions may work not just against the licensee but may threaten the basic provision of local broadcast service by that station. This concern applies particularly where small stations -- primarily radio stations -- are involved.

Additionally, and on the matter of "upward adjustments," NAB urges the Commission to adopt a policy that will ensure that "upward adjustments" for "repeated or continuous" violations will not be based on other forfeiture proceedings against the same licensee unless these proceedings have been the subject of final adjudication.¹⁴ Taking such an approach would be consistent with not only relevant statutory law but also with fundamental concepts of due process.

Moreover, and in response to the Commission's request for recommendations on the applicability of the new base fine list,¹⁵ NAB urges the FCC to make such base fines applicable only on a prospective basis. Indeed, it would appear that the Commission should take the additional step of rescinding those fines which were based on the 1991 Policy Statement or 1993 Policy Statement and have not yet been paid.

¹⁴See, in this regard, the constraints placed on FCC forfeitures by Section 504 (c) of the Communications Act.

¹⁵See Notice, supra note 10, ¶ 6.

IV. ADOPTING A MORE EFFECTIVE METHOD OF ACHIEVING RULE COMPLIANCE

In the "Regulatory Flexibility Act" analysis accompanying the Notice, the Commission states that its "objective" is to seek information "... regarding the guidelines to be used in implementing its authority to issue increased monetary penalties.¹⁶ That analysis also indicates that the Commission is soliciting comments on "...better ways to accomplish the goals of developing guidelines for determining forfeiture amounts..."¹⁷

It is NAB's view that the Commission's goal should not be so narrow, nor should it be focussing on ways to "increase" fines. Rather, the FCC should be centering its efforts on ways to better achieve rule compliance -- not simply ways of penalizing its regulatees.

The requested, fundamental change that NAB would like to see in the FCC's approach to achieving rule compliance relates to the methods employed by the Commission's Washington-based and field personnel involved in rule enforcement. That is, NAB recommends that the agency simply cease its issuance of fines for "first occurrences" of lesser offenses (those that do not involve threats to safety, evasion of the FCC's regulatory process or serious interference). For the detection of these often trivial violations (e.g. failure to have placed one or two documents into

¹⁶Id., ¶ 11 (emphasis added).

¹⁷Id., ¶ 16.

the station's public file in a timely fashion over the course of a five or seven-year license term), the Commission and its staff simply should issue a warning and an explanation on how the station can achieve compliance.

While this approach would be a marked departure from current FCC practice, it would seek to replicate the kind of broadcaster/FCC inspector relationship that existed several decades ago. In that era the detection of a minor rule violation often resulted in the inspector pointing out the defect and urging the licensee to correct the matter in a reasonable period of time.

However, this approach need not amount to an abandonment of the Commission's goal of attaining rule compliance. Indeed, it will help better achieve it. For example, a failure of the "warned" licensee to come into compliance within a reasonable period of time well could be met by the issuance of the base fine for the next violation detected and an increase over the base fine level for a repeated, uncorrected violation.

Moreover, if the Commission's staff (e.g. during a field inspection) were to spot more than a small number of "lesser" rule violations, it may well be that the Commission would be acting properly by issuing a Notice of Apparent Liability for all the detected rule violations. That is, in such a case the presence of a multitude of violations -- even minor

ones -- would indicate that the licensee/permittee had taken its FCC responsibilities less seriously than should be acceptable.

V. SPECIFIC RULE CONSIDERATIONS

Below NAB offers some specific recommendations for particular rules addressed in the proposed "base fine" list found in the Notice. We believe that enforcement of these rules should be governed along the lines suggested herein.

■ **Exceeding Authorized Antenna
Height; Operation at Unauthorized
Location**

At the present time the Commission is planning to adopt a new tower registration program.¹⁸ NAB expects that, during the initial tower registration process, some broadcasters and other communications companies may be found to be transmitting from geographic coordinates, and with tower height, etc., that are close to, but nevertheless different from, the terms of the instrument of license. These differences may result from the new use of global positioning satellite system ("GPS") information or new mapping coordinates.¹⁹ Because these differences, whether due to the use of GPS data or other information sources, are

¹⁸See Notice of Proposed Rule Making in WT Docket No. 95-5, FCC 95-16, released January 20, 1995.

¹⁹See Public Notice, DA 92-1188, dated September 1, 1992. The Commission is currently using the North American Datum of 1927 as the basis for all of its tower coordinate data. The Commission has indicated that it will eventually be required to use coordinates based on the North American Datum of 1983.

based on factors that do not reflect a licensee's effort to deviate from the terms of the FCC authorization, no fines should be assessed for these modest departures from authorized location, height, etc.

■ **Equal Employment Opportunity**

In the same fashion that various parties had challenged the 1991 Policy Statement and 1993 Policy Statement for their failure to abide by the terms of the APA, a similar complaint was advanced by NAB, among other parties, concerning the Commission's adoption of a February 1994, set of standards defining Equal Employment Opportunity violations and assessing forfeitures and other sanctions for such violations.²⁰ Recently the Commission formally recognized that the impact of the USTA v. FCC decision extended to this EEO Policy Statement as well.²¹

We recommend that the Commission, in the instant proceeding, not reinstitute a base fine for EEO violations. Rather, the Commission should address issues of EEO enforcement in a future rulemaking proceeding that also will address the

²⁰See Policy Statement, Standards for Assessing Forfeitures for Violations of the Broadcast EEO Rules ("EEO Policy Statement"), 9 FCC Rcd 929 (1994).

²¹See In re Applications of WHYW Associates, L.P., et al., FCC 95-45, released February 21, 1995. In this decision that Commission noted (at ¶ 8): (1) NAB's July 13, 1994, letter to the FCC General Counsel, in which we argued that the USTA v. FCC case required the Commission to withdraw its EEO Policy Statement until it was made available to the public for notice and comment; and (2) that the FCC, pending the issuance of a "separate order," would use its pre-EEO Policy Statement process of stare decisis to evaluate the merits of the EEO case before the Commission.

broadcaster "EEO performance standards" that will be used in the future regarding the recruitment and hiring of women and minorities.

■ **No Licensed Operator On Duty**

In response to several requests by NAB,²² the Commission has instituted a rule making²³ designed to eliminate the regulatory requirement for a licensed operator to be "on duty" and in charge of a broadcast station's technical facilities during all hours of station operation. In that proceeding the Commission considers not only the rescission of the "attended operation" requirement but also the related requirement that any person in control of a station's technical facilities hold an operators' license. Because the Commission has indicated its intent to eliminate these requirements -- consistent with the authority now conferred on it by Congress²⁴ -- it should not fine stations for violation of these rules during what we hope

²²Several times NAB urged the Commission to institute rulemaking proceedings to consider the elimination of the "attended operation" requirement for broadcast stations. See, e.g. Comments of NAB in MM Docket Nos. 91-171 and 91-301, filed November 12, 1993; Letter to the Honorable James H. Quello, from NAB President and CEO Edward Fritts, dated September 22, 1993; Letter to The Honorable Reed Hundt, from NAB President and CEO Edward Fritts, dated June 22, 1994.

²³Notice of Proposed Rule Making in MM Docket No. 94-130, 59 Fed Reg. 64378 (December 14, 1994).

²⁴Telecommunications Authorization Act of 1992, Pub. L. No. 102-538, 106 Stat. 3533.

will be only a brief interim between the current date and the time the FCC adopts its proposals in MM Docket No. 94-140.

■ **EBS Equipment Not Installed or Operational**

Currently the Commission -- and broadcasters, among others -- are involved in a process of implementing and further revising the Emergency Alert System ("EAS"), which the Commission has chosen to replace, over time, the current Emergency Broadcast System ("EBS").²⁵

NAB and four other parties have filed a petitions for reconsideration of the Commission's Report and Order.²⁶ Thus, there now is both an EBS-EAS transition and, due to the pendency of the reconsideration process, a significant degree of uncertainty as to the nature and ultimate timing of the new emergency-related rules that will affect broadcasters and others. There also are changes now being made to existing EBS gear. All these factors should affect FCC enforcement of its related rules.

First, the Commission is requiring that, by July 1, 1995, all EBS monitoring gear be modified to accommodate activation with a two-tone signal of a duration of no more than

²⁵See Report and Order and Further Notice of Proposed Rule Making in FO Docket Nos. 91-171 and 91-301, 59 Fed. Reg. 67090 (December 28, 1994).

²⁶See NAB Petition for Partial Reconsideration in ET Docket Nos. 91-171 and 91-301, filed January 27, 1995. The NAB Petition and the reconsideration petitions of four other parties were acknowledged in the Commission's Public Notice, "Petitions for Reconsideration of Actions in Rulemaking Proceedings," Report No. 2055, 60 Fed. Reg. 7543 (February 8, 1995).

eight seconds (reduced from the current 20-25 second standard length). Because stations will need time to modify existing EBS equipment, such modifications likely will involve stations' employment of that part of the Commission's rules²⁷ allowing stations to operate without "defective" EBS equipment for a period up to 60 days. Because such gear must be altered by July 1, 1995, the Commission should consider all existing EBS decoders to be "defective" such that stations not using such equipment -- while alterations/repairs are being effected -- will not be subject to fines or other enforcement actions for not having EBS equipment "installed or operational."

Second, NAB recommends that, during the transition between EBS and EAS, the Commission adopt a less demanding enforcement stance, even though the subject matter of the rules here potentially can involve safety and the protection of life and property. Because of the changes in emergency alerting procedures -- at the federal, state and regional levels -- the Commission should not make this transition more difficult by its rigorous enforcement of rules that also are subject to change over the near term.

■ Lottery/Contest Broadcasts

The Commission enforces, in addition to its "licensee-conducted contest" rule,²⁸ a rule²⁹ which tracks precisely the

²⁷See Section 73.932 (d) of the Commission's Rules.

²⁸See Section 73.1216 of the Commission's Rules.

²⁹See Section 73.1211 of the Commission's Rules.

anti-lottery advertising provisions of the United States Criminal Code.³⁰ Significantly, in its recent recommendations for Congressional legislative changes, the Commission has asked that these criminal code provisions be revised to allow the advertising of lotteries that are lawful where conducted.³¹ Similar legislative changes also are being considered in bills now pending before the Congress.³²

Because of the Commission's obvious distaste for the current lottery law provisions, we urge the agency to exercise its discretion to limit the issuance of fines and forfeitures for lottery advertising rule violations pending the determination, in this term of Congress, whether the relevant statutory law will change.

VI. CONCLUSION

For the reasons stated herein, we urge the Commission to revise its proposed schedule of forfeitures to reduce the base fine amounts for violations not affecting safety, blatant evasion

³⁰See 18 U.S.C. §§ 1304 et seq.

³¹Creating a Federal Communications Commission for the Information Age, Report of the Special Counsel to the Commission on Reinventing Government, February 1 1995, Appendix A, at 3.

³²At of this writing the Senate Commerce Committee reported out a bill which, inter alia, would modify the federal lottery laws to allow a station to advertise lawfully-conducted lotteries operating in the state in which the station has its city of license.

of the FCC's regulatory process or the potential of serious interference to broadcasters or other communications operations. Furthermore, the Commission should develop a system of giving "warnings" and "compliance guidance" for such less serious violations detected either by FCC Washington personnel or by field inspectors employed by the Commission's Compliance and Information Bureau.

These steps, NAB believes, will afford greater equity into the rule enforcement process and will make greater strides to the goal of overall rule compliance.

Respectfully submitted,

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CERTIFICATE OF SERVICE

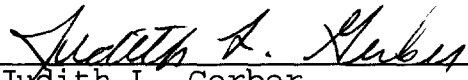
I, Judith L. Gerber, do hereby certify that a true and correct copy of the foregoing "Comments of the National Association of Broadcasters" in CI Docket No. 95-6 was delivered, by hand, on this date, March 27, 1995, to the following:

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